

Daniel M. Lucas
Deputy Attorney General
California Department of Justice
Office of the Attorney General
300 South Spring Street
Suite 1702
Los Angeles, California 90013

Re: Freedom of Information Act Request EPA-HQ-2018-001886

Dear Mr. Lucas:

This is in response to your Freedom of Information Act (FOIA) request, which was received on November 21, 2017, requesting records relating to reporting required by 40 C.F.R. Part 60 Subpart 0000a. We have enclosed a CD containing the reports pursuant to Subpart 0000a regarding items 1(a)-(e) below. Specifically, you requested the following records¹:

1. Reports submitted to The U.S. Environmental Protection Agency (EPA) pursuant to Subpart 0000a's reporting requirements including, but not limited to, the following reports:
 - a. Results of Performance Test, as required by section 60.5420a(b)(9)(i);
 - b. Initial Semiannual Reports, as required by section 60.5422a9b);
 - c. Semiannual Reports, as required by section 60.5422a(a);
 - d. Annual Reports, as required by section 60.5420a(b); and
 - e. Annual Reports of Excess Emissions for Sweetening Units, as required by section 60.5423a(b).
2. Copies of all correspondence between EPA and outside parties containing:
 - a. Reference to the new source performance standards for the oil and gas sector, subpart 0000a, or any of the specific reports or regulatory provisions listed above in paragraph (1); and
 - b. One or more of the following terms;
 - i. "comply," including any inflection thereof (e.g. "complies," "complying," "compliant," or "compliance");
 - ii. "deadline" or "deadlines"
 - iii. "delay," including any inflection thereof (e.g. "delays," "delayed," or "delaying")
 - iv. "due"
 - v. "enforce," including any inflection thereof (e.g. "enforces," "enforcing," or "enforcement")
 - vi. "extend," including any inflection thereof (e.g. "extends," "extending," "extension," or "extensions")

vii. "postpone," including any inflection thereof (e.g. "postpones," "postponed," "postponing," or "postponement")

viii. "variance" or "variances"

3. Copies of all internal correspondence within EPA containing:

a. Reference to the new source performance standards for the oil and gas sector, subpart 0000a, or any of the specific reports or regulatory provisions listed above in paragraph (1); and

b. One or more of the following terms;

i. "comply," including any inflection thereof (e.g. "complies," "complying," "compliant," or "compliance");

ii. "deadline" or "deadlines"

iii. "delay," including any inflection thereof (e.g. "delays," "delayed," or "delaying")

iv. "due"

v. "enforce," including any inflection thereof (e.g. "enforces," "enforcing," or "enforcement")

vi. "extend," including any inflection thereof (e.g. "extends," "extending," "extension," or "extensions")

vii. "postpone," including any inflection thereof (e.g. "postpones," "postponed," "postponing," or "postponement")

viii. "variance" or "variances"

The Agency is now releasing records in response to your request. Please note that this is an interim response and the EPA continues to work on your request.

The records that EPA is releasing are:

1. Records responsive to Items 1(a), 1(b), 1(c), 1(d), and 1(e) which were submitted electronically to our Compliance and Emissions Data Reporting Interface (CEDRI).

The Agency expects to complete its response to your request by February 9, 2018. Again, your request is not being closed at this time. When your request is closed, you will receive information concerning your appeal rights for any part of EPA's response. If you have any questions about this interim production or your request generally, please contact Marcia Mia, of my staff, at (202) 564-7042 or mia.marcia@epa.gov. Additionally, you may seek assistance from EPA's FOIA Public Liaison at hq.foia@epa.gov or call (202) 566-1667. Last, you may also seek assistance from the Office of Government Information Services (OGIS). You may contact OGIS in any of the following ways: by mail, Office of Government Information Services, National Archives and Records Administration, 8610 Adelphi Road, College Park, MD 20740-6001; email: ogis@nara.gov; telephone: (202) 741-5770 or (877) 684 6448; or fax: (202) 741-5769.

Sincerely,

Edward J. Messina, Director

Monitoring, Assistance and Media Programs Division

Office of Compliance

Enclosure

1 In a follow-up letter dated December 8, 2017, you agreed to limit the geographic scope of the request to EPA Headquarters and EPA Regions 3-10. For Items 2 and 3, you agreed to limit the scope of "EPA" to include only the Office of Enforcement and Compliance Assurance (OECA), the Office of the Administrator (AO), and the Office of Air Quality Planning and Standards (excluding the sub-offices of the Office of Radiation and Indoor Air and the Office of Transportation and Air Quality).
